

Kellie Nelson Fetter (Wyo. Bar No. 7-4597)  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**ABC IP, LLC**

**Plaintiff.**

**-vs-**

**FRT TRIGGERS LLC**

**Defendant.**

CASE NO. 1:25-CV-00124-SWS

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**AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT  
INJUNCTION**

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Pursuant to a fully executed, confidential settlement agreement amongst all parties, resolving all claims and counterclaims at issue in the above-captioned action, the Plaintiff ABC IP, LLC (hereinafter "Plaintiff") and Defendant FRT Triggers, LLC (hereinafter "Defendant") (collectively, "the Parties"), hereby stipulate and agree to entry of a Consent Judgment and Permanent Injunction and in support thereof state as follows:

1. Plaintiff and Defendant have resolved all claims in connection with this matter and have agreed to the entry of the Consent Judgment and Permanent Injunction ("Consent Judgment") in the form attached hereto as Exhibit 1.

2. Defendant has executed a Consent to be Bound by the Consent Judgment and Permanent Injunction, as depicted on Page 8 of Exhibit 1, hereto.

Accordingly, as Plaintiff and Defendant have resolved all claims and counterclaims in this action, the Parties respectfully request that this Court grant this Motion and enter the Consent Judgment.

IT IS SO STIPULATED

June 4, 2025

FRT Triggers, LLC

By: J. Pounds  
Title: Manager  
Date: 6/4/25

Respectfully submitted,

/s/Kellie Nelson Fetter

Kellie Nelson Fetter (WSB 7-4597)  
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*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all Parties of Record via the Court's *ECF* Filing System on June 4, 2025.

/s/  
Kellie Nelson Fetter